

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 1:12-CR-42

v.

Honorable Robert Holmes Bell
United States District Judge

REUBEN OLSON, III,

Defendant.

**MEMORANDUM IN SUPPORT OF
DEFENDANT'S MOTION FOR DETERMINATION OF COMPETENCY
AND SANITY**

Defendant, Reuben Olson, III is charged in a one-count indictment for armed bank robbery in violation of 18 U.S.C. § 2113(a) and (d). It is alleged that this offense occurred on November 9, 2011 in Greenville, Michigan. On February 10, 2012, a criminal complaint was filed with this Honorable Court alleging Mr. Olson robbed Huntington Bank, located in Montcalm County, while armed with a pistol. As a result, an arrest warrant was filed and executed against Mr. Olson on the same date. A grand jury later returned an indictment on February 14, 2012. Mr. Olson appeared with defense counsel for his arraignment, initial pretrial conference, and detention hearing on February 15, 2012.

Defense counsel has met with Mr. Olson on several occasions, reviewed his social history, and medical records. The defendant has an extensive history of mental health related issues and treatment. Mr. Olson's mental health history includes, but not limited to, bipolar disorder, depression, and suicidal ideation. For the past few years, Mr. Olson has resided in adult foster care facilities and received mental health treatment in Kentucky, Indiana and Michigan. Mr. Olson has also received Social Security Supplemental Income (SSI) for the past several years due to his mental health condition.

After reviewing his social history and records, as well as, meeting with Mr. Olson, counsel has determined that an initial evaluation of the defendant needs to be completed. The government also advised its concerns regarding Mr. Olson's competency with the Court and defense counsel during the arraignment, initial pretrial conference and detention hearing held on February 15, 2012.

CONCLUSION

For the reasons set forth above, Rhona Taylor, counsel for Reuben Olson, III, submits that it appears there is reasonable cause and concern as to the defendant's competence in proceeding to trial. Counsel also believes a mental competency evaluation is necessary to determine whether Mr. Olson suffered from mental insanity or other mental health concerns in November 2011, at the time the offense occurred, through February 2012, when arrested for the instant offense. Counsel, thereby, does respectfully request that Mr. Olson be examined psychiatrically and/or psychologically to assist the Court in deciding his competency and mental status.

Respectfully submitted,

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Dated: March 29, 2012